



# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

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P. MICHAEL FREEMAN  
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January 22, 2009

TO: EACH SUPERVISOR

FROM: P. MICHAEL FREEMAN 

### **FIRE DEPARTMENT REVIEW AND RECOMMENDATIONS REGARDING CODE AMENDMENTS AND REVIEW REQUIREMENTS FOR MOBILEHOME PARKS IN HIGH FIRE HAZARD AREAS**

On November 18, 2008, the Board, on motion of Supervisor Yaroslavsky, directed the Fire Department and the Department of Public Works to prepare recommendations for changes in the applicable County codes for mobilehomes and mobilehome parks in high fire hazard areas that would reduce their vulnerability to fire. In addition, the Board directed that the Department review water flow, fuel modification, and brush clearance requirements related to mobilehome parks, and make recommendations on how these codes could be strengthened or better enforced in the interest of the safety of these communities.

We have concluded our review, and we are taking the following actions:

1. Amend the Fire Department's Fire Flow and Hydrant requirements (Regulation #8) to include 4000 GPM fire flow for new mobilehome parks in the Very High Fire Hazard Severity Zone (VHFHSZ) by February 1, 2009, and increase the required brush clearance to 400 feet for mobilehome parks.
2. Enhance enforcement as noted.

### **Background**

The State Department of Housing and Community Development (HCD) is responsible for establishing requirements for manufactured homes, mobilehomes, multi-family manufactured

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homes, and commercial modulars (mobilehomes) newly installed or relocated in a State Responsibility Area, Very High Fire Hazard Severity Zone, or Wildland Urban Interface Area (high fire hazard areas). Under federal law, the Manufactured Housing Act preempts local ordinances from regulating the construction of manufactured housing and mobilehomes.

HCD is in the process of adopting regulations pursuant to the Manufactured Housing Act requiring all new mobilehomes located in high fire hazard area to meet the ignition-resistant manufactured housing regulations based on the requirements of Chapter 7A of the 2007 California Building Code. Chapter 7A establishes ignition-resistant and ember intrusion construction standards for roofing, attic ventilation, exterior walls, decking, floors, and underfloor protection, for structures and ancillary buildings. These proposed regulations have an anticipated effective date of January 30, 2009.

On January 1, 2001, Senate Bill 1627 allowed local fire departments to utilize their fire code to enforce certain fire safety provisions in all mobilehome parks. These provisions include water supply for hydrant systems, fire equipment vehicular access, parking, lot identification, weed abatement, debris abatement, combustible storage abatement, and security bars. The Fire Department continues to diligently inspect mobilehome parks within our jurisdiction and enforce these regulations.

#### **Review of Water Flow, Fuel Modification, and Brush Clearance Requirements**

There are existing (after January 1, 2001) mobilehome parks which are required to have a fire flow of 1250 gallons per minute (GPM) for two hours. In new mobilehome parks, once Regulation #8 is amended, the 4000 GPM will be required. New parks will also have fire hydrants spacing of 600 feet.

Title 20 of the Los Angeles County Utilities Code requires water system redundancy to ensure a reliable water supply for fire suppression. Gravity fed water systems are the most reliable and are commonly used. When electric water pumps are used, two sources of power must be provided to a minimum of two pumps ensuring system stability. This requirement will be emphasized as we continue to work with Public Works and local water purveyors, which have enforcement authority for water supply regulations.

Brush clearance is required around all inhabited structures in high fire hazard zones. Fuel modification is required for any new developments in these zones. Housing density and associated small lot sizes in mobilehome parks requires aggressive brush and ornamental vegetation clearance within and around the perimeter of the park.

#### **Recommendations to Better Enhance the Safety of these Communities**

The Department will carefully review all mobilehome parks within its jurisdiction and complete the following tasks:

Each Supervisor  
January 22, 2009  
Page 3

1. Amend the Fire Department's Fire Flow and Hydrant requirements and implement no later than February 1, 2009.
2. Complete comprehensive brush clearance inspections for structures in these parks. While completing brush clearance inspections, Department personnel will require that combustible items next to structures be moved, lots are properly identified, and ensure that Fire Department access is maintained.
3. Identify older mobilehome parks that have a fire flow less than 1250 GPM for two hours, and coordinate with Public Works and local water purveyors to identify options to increase the water supply although new fire code provisions would not apply retroactively.
4. Identify water systems that do not have a redundant means of water delivery and coordinate with Public Works and water purveyors to ensure compliance with Title 20.
5. Work with law enforcement to develop comprehensive evacuation plans, based on rapid egress from an approaching fire.
6. Develop an outreach program to inform mobilehome park residents on emergency procedures.

If you have any questions, please contact me at (323) 881-2401.

PMF:jt

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